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May 5, 2016

Via ECF

Hon. Steven I. Locke, U.S.M.J.  
U.S. Courthouse  
100 Federal Plaza, Courtroom 820  
Central Islip, NY 11722

Re: Siancas et al. v. Exclusive Detailing Inc. et al.  
Docket No.: 2:14-cv-6151

Dear Judge Locke:

This office represents defendant Exclusive Detailing, Inc. (EDI) in the above referenced matter. Pursuant to Your Honor's order dated April 4, 2016, please accept the following status update as to EDI's bankruptcy filing.

1. EDI's Bankruptcy

Exclusive Detailing, Inc. is in the process of filing for Chapter 7 protection. Based upon the timing and season of the filing, we are still waiting to receive Exclusive's 2015 Corporate Tax Returns from the accountant in order to file same. Michael Agolia, principal of Exclusive Detailing, Inc., and his wife have filed their bankruptcy application, Case No.: 16-13291, and it is proceeding before the appointed Trustee, Bruce Atkinson.

2. Plaintiff's Pending Motion to Compel against EDI

Plaintiff currently has a motion to compel pending with the court against EDI. The discovery Plaintiff seeks has been satisfied. On December 2, 2015 I submitted correspondence to the court as to the Excel spreadsheets relating to the employee lists (Document 110). On December 14, 2015 I submitted correspondence to the court, wherein I advised that defendant submitted to Plaintiff's counsel a USB drive. (Document 111). In addition, the above bankruptcy filing will make this entire matter moot.

Respectfully Submitted,

*Michael K. Chong*

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MKC/

cc: Plaintiff's counsel  
Co-Defendants' counsel / Rallye Motors Defendants  
Clients